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DEPT. OF TRANSPORTATION

HERCULES TIRE & RUBBER CO.

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RUBBER DIVISION

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February 22, 2001

Docket Management Section
National Highway Traffic Safety Administration
400 Seventh Street, S.W., Room PL-401
Washington, DC 20590

NHTSA-00-8296-191

To Whom It May Concern:

**RE: Docket No. NHTSA -00-8296- Request for Comments
-Certification; Federal Motor Vehicle Safety Standards;
Tire Identification and Record Keeping; Consumer
Information Regulations**

The Hercules Tire and Rubber Company markets new, private branded replacement tires produced by contracted manufacturers who exceed prescribed DOT regulations. Our branded tire line encompasses passenger car, light truck, medium truck/bus, and small OTR (off the road) sizes and is sold globally.

Hercules is also a major manufacturer and provider of tread rubber, equipment, and supplies to the retreading industry. Our retreading customers primarily service the commercial trucking, off road equipment, and aircraft industries as passenger car tire retreading has waned as an economic alternative to new passenger car tires.

Hercules acknowledges the need for labeling OEM, replacement, and retreaded tires and supports all current Federal Motor Vehicle Safety Standards.

Hercules believes that current labeling requirements, as enumerated in FMVSS Nos. 109, 119, 117, 129, part 574, and other publications, already achieve the federal governments objectives of identifying and providing a means of recalling tires that may be subject to a safety recall. Existing standards also fulfill the government's intent for communicating relevant tire information such as tire size,

construction, inflation, load, and quality information to the consumer. In addition to all mandated labeling, tire manufacturers also voluntarily include relevant safety information on tire sidewalls and consumer tire labels.

Current labeling of new and retreaded tires has been well established and has proven effective and practical in the past. Updating existing information would require the new and retreaded tire industries to commit a significant investment to modify molds and procedures. In the end, any cost would ultimately have to be recouped directly from tire purchasers and it is doubtful that proposed changes would impact tire safety.

Fortunately, trucking industry and commercial tire service personnel are generally well trained and knowledgeable of tire labeling as well as applicable OSHA work place safety rules. They recognize that proper tire maintenance is a cost-effective means of preventing costly vehicle down time and customer inconvenience. Commercial vehicles already fall under federal DOT, state public utilities, and CVSA regulations, for example, that allow for them to be placed out of service and fined if their tires are found to be out of compliance.

Thank you for the opportunity to present another view on this important issue. Please do not hesitate to contact Hercules if we can be of any further assistance.

Sincerely,

Trent Longo

Technical Manager
The Hercules Tire & Rubber Company